

Yackulic, Ted

From: Mike Petersen <mpetersen@landscouncil.org>
Sent: Wednesday, April 18, 2018 3:36 PM
To: ENRD, PUBCOMMENT-EES (ENRD)
Subject: The Lands Council comments on Bunker Hill Mining Corporation

April 18, 2018

RE: Bunker Hill Mine Settlement

Dear U.S. Department of Justice and Environmental Protection Agency,

The Lands Council would like to provide comments on the proposed settlement between the EPA, Department of Justice, and the Bunker Hill Mining Corporation and Placer Mining Company, Inc. The Settlement would attempt to resolve the company's cleanup liability in the Silver Valley of North Idaho, near Kellogg, Idaho.

The Lands Council has long been involved with the legacy of mining waste coming from the Silver Valley, down the Coeur d'Alene River, through Lake Coeur d'Alene into the Spokane River. Lead, zinc, mercury and other contaminants have ended up along the shores of the Coeur d'Alene River and the Spokane River. We have done outreach regarding lead health impacts along the Spokane River and in at risk neighborhoods in Spokane.

We are concerned that a re-opening of the Bunker Hill mine, without adequate cleanup funding, a specific schedule of measurable cleanup efforts and a long term plan to ensure that toxic materials do not leave the site, will create extensive human and environmental health risks.

We are concerned that the measures to stem overland flow from the mine area (Kellogg Portal, for example) may not be adequate if expected precipitation events, upslope wildfires, and more precipitation falling as rain vs snow occurs.

There should be an assessment of the risks posed by wildfire on the Bunker Hill site, as well as changes in precipitation and flood risk. There should be more rigorous mitigation measures than having sandbags on site.

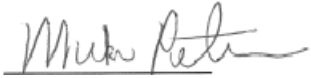
The maximum \$1000 per violation per day fine should be increased, as it is unlikely that amount would mitigate damage that could occur during cleanup and operations.

All payments from the Bunker Hill Mining Special Account should be required to be deposited solely into the Special Account, and not the general EPA Hazardous Substance account.

Given the level and expense of the ongoing Superfund Site in the Silver Valley and downstream, this agreement seems rushed and in need of significant scientific and legal review.

We appreciate the opportunity to comment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mike Petersen", is written over a horizontal line.

Mike Petersen, Executive Director
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